AMENDMENTS TO THE DRAWINGS

Applicant is submitting herewith three sheets of formal replacement sheets of drawings for Figures 6B, 7 and 14.

Attachment: 3 Replacement Sheets

REMARKS

Claims 1-10 have been examined. Claim 10 has been rejected under 35 U.S.C. § 112, second paragraph, and claims 1-9 have been rejected under 35 U.S.C. § 102(a) and (e).

I.   Preliminary Matters

The Examiner has objected to the drawings due to typographical errors in Figures 6B, 7 and 14. Accordingly, Applicant is submitting herewith three formal replacement sheets of drawings. Applicant requests the Examiner to withdraw the drawing objection.

Also, the Examiner appears to have objected to the Specification in regard to the section headings. However, Applicant believes the specification to be in compliance with the requirements. Therefore, no changes have been made at this time.

II.   Rejection under 35 U.S.C. § 112, second paragraph

The Examiner has rejected claim 10 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Applicant submits that amended claim 10 complies with the requirements of 35 U.S.C. § 112, second paragraph.

III.   Rejections under 35 U.S.C. § 102(a) and (e)

The Examiner has rejected claims 1-9 under 35 U.S.C. § 102(a) and (e) as allegedly being anticipated by U.S. Patent No. 6,587,915 to Kim ("Kim").

A.   Claim 1

Applicant submits that claim 1 is patentable over the cited reference. For example,

claim 1 recites, "if changing of data of the data block recorded in the alternative area is

requested, recording a data block having changed data in the data area and deleting the mapping

information recorded in the alternative area from the mapping area."

Applicant submits that the Kim reference is absolutely silent to the recording of changed

data in the "data area" when changing of data of a data block recorded in an "alternative area" is

requested. Further, in Kim, when data is updated, the state of the corresponding block is

updated to "deleted." Applicant submits that the actual *deletion* of mapping data is different

from updating a *state* to "deleted."

In view of the above, Applicant submits that claim 1 is patentable over the cited

reference and respectfully requests the Examiner to reconsider and withdraw the rejection.

B.   Claims 2-4

Applicant submits that claims 2-4 are patentable at least by virtue of their dependency

upon claim 1.

C.   Claim 5

Applicant submits that claim 5 is patentable over the cited reference. For example,

claim 5 recites that when a data block write request is received, the mapping information is

searched. If there is no mapping information on the requested data block, the requested data

block is written in an alternative area and the mapping information is recorded. On the other

hand, if there is mapping information on the requested data block, the requested data block is

written in the data area and the mapping information is deleted.

The Examiner refers to column 10, lines 27-44, as disclosing the above features.

However, Kim fails to teach or suggest the distinction of writing in an alternative area based on

whether or not there is mapping information on the requested block, as recited in claim 5. As

set forth in Kim, the CPU 1 searches a logical unit number and a physical unit number to which

a corresponding block belongs to judge whether the corresponding data block exists in the

physical unit (col. 10, lines 15-22). If the corresponding data block does exist, the map block is

searched to determine if the block is allocated or not (col. 10, lines 22-43). A change in data is

then written to a spare block based on the allocation (col. 10, lines 33-43). There is no teaching

that the writing of the data to the spare block (i.e., alleged alternative area) depends on there

being no mapping information on the requested block. Kim simply fails to teach or suggest

such a feature.

If the Examiner wishes to persist in the above rejection, Applicant respectfully requests

the Examiner to specifically indicate where Kim teaches that if there is no mapping information,

the data block is written to an alternative area.

D.   Claim 6

Similar to Applicant's comments presented above for claim 5, Kim fails to teach or

suggest that where a data block is read is based on a distinction of whether or not there is

mapping information on the requested data block (see col. 9, lines 35-53 of Kim which

discloses the read operation). Accordingly, Applicant submits that claim 6 is patentable over

the cited reference.

E.   Claim 7

Since claim 7 contains features that are analogous to the features recited in claim 1,

Applicant submits that claim 7 is patentable for at least analogous reasons as presented above.

F.   Claims 8 and 9

Applicant submits that claims 8 and 9 are patentable at least by virtue of their

dependency upon claim 7.

IV.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

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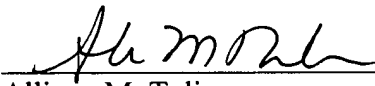
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Respectfully submitted,

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